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15 [Additional defendants and counsel
16 listed on signature pages]

17 UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA
19 (SAN FRANCISCO DIVISION)

20 IN RE TFT-LCD (FLAT PANEL)
21 ANTITRUST LITIGATION

22 Case No. M 3:07-md-1827 SI; MDL 1827
23 Individual Case No. 3:10-cv-0117 SI

24 This Document Relates To Individual Case No.:
25 3:10-cv-0117 SI

26 **STIPULATION AND [PROPOSED]
27 ORDER REGARDING ANSWERS TO
AMENDED COMPLAINT**

28 ELECTROGRAPH SYSTEMS, INC.;
ELECTROGRAPH TECHNOLOGIES, CORP.

Honorable Susan Illston

Plaintiffs,

v.

EPSON IMAGING DEVICES CORPORATION,
et al.

Defendants.

WHEREAS, plaintiffs Electrograph Systems, Inc. and Electrograph Technologies, Corp. (“Electrograph”) filed the above captioned lawsuit on November 6, 2009 (“Complaint”);

1 WHEREAS, defendants Hitachi, Ltd., Hitachi Displays, Ltd., Hitachi Electronic Devices
2 (USA), Inc., Epson Imaging Devices Corporation, Epson Electronics America, Inc., Sharp
3 Corporation, Sharp Electronics Corporation, Toshiba Corporation, Toshiba America Electronic
4 Components, Inc., Toshiba America Information Systems, Inc., Toshiba Mobile Display Co.,
5 Ltd., LG Display Co., Ltd., LG Display America, Inc., AU Optronics Corporation, AU Optronics
6 Corporation America, Samsung Electronics Company, Ltd., Samsung Semiconductor, Inc.,
7 Samsung Electronics America, Inc. and HannStar Display Corporation (“Stipulating Defendants”)
8 filed answers to the Complaint on March 15, 2010;

9 WHEREAS, pursuant to this Court’s order dated August 29, 2011 on Mitsui & Co.
10 (Taiwan), Ltd.’s (“Mitsui Taiwan”) motion for judgment on the pleadings for lack of personal
11 jurisdiction, which granted Electrograph “leave to amend its complaint to set forth its theory of
12 jurisdiction” over Mitsui Taiwan (MDL Dkt. No. 3395), Electrograph filed an amended complaint
13 on September 23, 2011 (“Amended Complaint”) identical to the Complaint with regard to
14 allegations concerning the Stipulating Defendants, but adding allegations regarding defendant
15 Mitsui Taiwan;

16 WHEREAS, response(s) to the Amended Complaint must be filed by October 10, 2011;

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the
18 undersigned counsel, on behalf of their respective clients, Electrograph, on the one hand, and the
19 Stipulating Defendants on the other hand, as follows:

20 1. Stipulating Defendants’ respective answers, filed on March 15, 2010, to the allegations
21 in Electrograph’s Complaint are hereby deemed responsive to the corresponding allegations in
22 Electrograph’s Amended Complaint and no further responsive pleading on behalf of the
23 Stipulating Defendants to Electrograph’s Amended Complaint shall be required.

24 2. To the extent Electrograph’s Amended Complaint contains any additional or
25 substantively revised allegations to which a response may be deemed to be required from the
26 Stipulating Defendants, such allegations are hereby deemed denied.

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1 Dated: October 5, 2011
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3 By: /s/ Kent M. Roger

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FILER'S ATTESTATION

I, Kent M. Roger, am the ECF user whose identification and password are being used to file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby attest that Michael Lazertwitz, Christopher Nedeau, Melvin Goldman, Hugh Bangasser, Robert Wick, John Grenfell, John Chung, and Philip Iovieno concur in this filing.

/s/ Kent M. Roger

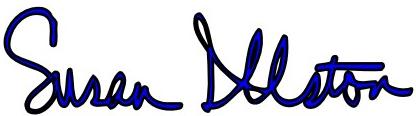
Kent M. Roger

Attorneys for Defendants Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA), Inc.

1 **[PROPOSED] ORDER**

2 Pursuant to the parties' stipulation set forth above and pursuant to Rule 6-1(a) of the Civil
3 Local Rules, IT IS SO ORDERED.

4 Dated: October 6, 2011

5 By 
6 HON. SUSAN ILLSTON
7 UNITED STATES DISTRICT JUDGE

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